AGENDA TITLE: Consider Certification of the White Slough Water Pollution Control Facility Expansion Supplemental Final Environmental Impact Report

MEETING DATE: August 19. 1992

PREPARED BY: Community Development Director

RECOMMENDED ACTION: That the City Council determine the Supplemental Final Environmental Impact Report (SFEIR) for Uhite Slough Water Pollution Control Facility Expahsion prepared by EIP Associates is adequate and certify the document.

BACKGROUND INFORMATION: The purpose of this document is to revise and supplement the June 1988 Environmental Impact Report (EIR) for the White Slough Water Pollution Control Faci' ty Plant Expansion. The preparation of this Supplemental EIR was required because new information became available since the certification of the original EIR. new information regards the relationship between receiving water quality and the WSWPCF performance. Specifically. the project description of the original EIR assumed the expanded facility would be capable of producing domestic effluent havinp 10 milligrams/liter (mg/L) or less biochemical oxyqen demand (BOO) and total suspended solids (TSS) more than 90 percent of the time.

FINDINGS: The project considered in the original EIR involved the expansion of the WSWPCF from an average dry, weather flow capacity of 6.2 million gallons per day (MGD) to 8.5 MGD (an increase of 2.3 MGD. or a 37% increase in capacity). together with improvements to the wastewater irrigation and sludge handling systems. The proposed action under consideration in the Supplemental EIR is the same as considered in the original EIR with one exception: the June 1988 EIR assumed the expanded WSWPCF would routinely produce an effluent quality of 10 mg/L BOD & TSS. The supplemental EIR examined the environmental effects that would result from WSWPCF production of an effluent with 30 mg/L BOD & TSS from 16 October to 31 May, and 20 mg/L from 01 June through 15 Oct.

The proposed action would result in an increase in the mass emission of BOD 6 TSS into the recefving waters. as compared to the existing conditions; however the dissolved oxygen (DO) levels in the receiving waters are expected to be maintained above standards currently established by the Regional Uater Quality Control Board. Water quality monitoring wculd be included, and no treated effluent would be discharged when DO levels fall below established standards. The City has begun preparing an additional 275 acres of recently purchased land to receive treated effluent to ensure adequate reuse/disposal capacity. As considered in the original EIR, the buildup of heavy metals in the soil would occur slowly as a result of the land reuse/disposal of effluent, but with the existing pretreatment program. effluent disposal could occur for about 200 years before the buildup reached levels where additional land disposal would be prohibited.

APPROVED Thos. A. Peterson

THOMAS A PETERSON

recycled paper

Summary of Environmental Effects - Proposed Actions

See attached Table S-1 and 5-2.

Finding

1. The City of Lodi finds that the supplemental Final EIR has been completed in compliance with CEQA;

2. The Supplemental Final EIR has been presented to the City Council and has been reviewed and considered prior to its approval; and

3. The City of Lodi will adopt the required mitigation measures to reduce all significant, or potentially significant environmental impacts to a less than significant level.

   Mitigation measures include:

   a. Additional water quality monitoring of the receiving waters will be conducted to provide complete data as to when ambient conbitions are such that DO levels should fall below 5.0 mg/l. When such conditions are present, WSWPCF effluent would be diverted to storage facilities or land application.

   b. Because disposal capacity is considered to be marginally adequate to accommodate extended perfods of irrigation when discharge is prohibited. the City of Lodi shall prepare an additional 275 acres of land for effluent application.

   c. Continue with the City's existing pretreatment program of industrial wastewater discharge to remove heavy metals with an emphasis on zinc.

Attached is a copy of the Supplemental Final Environmental Impact Report.

FUNDING: None required.

James B. Schroeder
Community Development Director

Prepared by David Morimoto, Sr. Planner

JBS/DSM/cg

Attachments

TABLE S-1

SUMMARY OF ENVIRONMENTAL EFFECTS . PROPOSED ACTION

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
The proposed action would result in an increased mass emission of pollutants, as compared to existing conditions.	S	Additional water quality monitoring should be conducted to provide better data as to when ambient conditions are such that DO levels could fall below 5.0 mg/l. When such conditions are present, WSWPCF effluent would be diverted for land application.	LS
The proposed action would increase the amount of treated effluent diverted to alternative disposal or storage facilities.	S	Because disposal capacity is considered to be marginally adequate to accommodate extended periods of irrigation when discharge is prohibited, the City of Lodi shall prepare an additional 275 acres of land for effluent application.	LS
The proposed action would result in the accumulation of heavy metals in the soils of croplands being irrigated with treated effluent.	S	As identified in the original EIR, the build-up of heavy metals in the disposal area soils would be mitigated by continuing and strengthening the City's existing industrial pretreatment requirements, with an emphasis on zinc removal.	LS

S = Significant
LS = Less than Significant
B = Beneficial
SU = Significant Unavoidable

TABLE S-2

SUMMARY OF ENVIRONMENTAL EFFECTS - ALTERNATIVE ACTION

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
The alternative action would result in a decreased mass emission of pollutants, as compared to the existing conditions.	B	None required or recommended.	B
The alternative action would result in the accelerated accumulation of heavy metals in the soils of croplands being irrigated with treated effluent.	S	As identified in the original EIR, the build-up of heavy metals in the disposal area soils would be mitigated by continuing and strengthening the City's existing industrial pretreatment requirement, with an emphasis on zinc removal.	LS
Implementation of the alternative action would result in an increased land area for effluent disposal.	S	The City of Lodi would be required to obtain approximately 1,600 acres of additional agricultural lands with which to dispose of the greater effluent volume.	LS

S = Significant
LS = Less than Significant
B = Beneficial
SU = Significant Unavoidable

EIP Associates

July 1992

White Slough Water Pollution Control Facility Expansion

Supplemental Final Environmental Impact Report

City of Lodi, California

SUPPLEMENTAL FINAL
ENVIRONMENTAL IMPACT REPORT

WHITE SLOUGH
WATER POLLUTION CONTROL FACILITY EXPANSION

SCH # 87072105

Prepared For:
City of Lodi, California

Prepared By:
EIP Associates
601 Montgomery St., Suite 500
San Francisco, CA 94111

July 27, 1992

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SUMMARY

S.1 INTRODUCTION

This document is a Supplemental Final Environmental Impact Report (SFEIR) that has been prepared in accordance with the California Environmental Quality Act (CEQA) of 1970. The purpose of this document is to revise and supplement the original EIR for the White Slough Water Pollution Control Facility (WSWPCF) Expansion (State Clearinghouse Number 87072105). The pnparation of this SFEIR is required under CEQA because new information has become available since the certification of the original EIR The new information is in regards to the relationship between existing receiving water quality and the WSWPCF performance. This SFEIR will be used by California Regional Water Quality Control Board. Central Valley Region (RWQCB) in its consideration of revised Waste Discharge Requirements (WDRs) for the White Slough WPCF.

The Project Description of the original EIR assumed that the expanded facility would be capable of producing domestic effluent having 10 milligrams/liter (mg/l) or less biochemical oxygen demand (BOD) and total suspended solids (TSS) more than 90 percent of the time ("10/10 treatment"). The cxpccted improvement in the quality of the effluent originally predicted for the expanded facility has not been fully realized, and therefore this SDEIR is required to examine the environmental effects that could result from the expanded WPCF capacity with little or no increase in treatment efficiency.

S.2 PROJECT UNDER REVIEW

The project considered in the original EIR involved the expansion of the WSWPCF from an average dry weather flow capacity of 6.2 million gallons per day (MGD) to 8.5 MGD (an increase of 2.3 MGD, or a 37 percent increase in capacity). together with improvements to the wastewater irrigation and sludge handling systems. The proposed action under consideration in this Supplemental EIR is the same as that considered in the original EIR with one exception: the original EIR assumed that the expanded WSWPCF would routinely produce an effluent quality of 10 mg/l BOD and TSS. A

Supplemental Draft EIR (SDEIR) was circulated for public review during the spring of 1992. The SDEIR examined the environmental effects that would result from WSWPCF production of an effluent with 30 mg/l BOD and TSS from 16 October to 31 May, and 20 mg/l from 01 June through 15 October.

As an alternative to the proposed action, the effluent limitations contained in thd original EIR could be implemented. These limitations arc 10 mg/l BOD and TSS, year-round ("10/10 treatment'). It should be noted that these performance standards are currently considered unrealistic because the WSWPCF achieves these performance levels infrequently. Please rcfcr to Chapter 2 of the April 1992 SDEIR for a more complete description of the proposed action and its alternative.

S.3 SUMMARY OF ENVIRONMENTAL IMPACTS

The proposed action and its alternative were analyzed as to their effects on hydrology and water quality, soils. and land use. These are the only environmental elements that would be affected by the proposed action. While aquatic life could be adversely affected, water quality standards are established to protect beneficial uses, including aquatic habitat. For the receiving water. a dissolved oxygen (DO) concentration of *5.0* mg/l has been established; thus. the project was analyzed as to its effects on water quality because it was assumed that as long as water quality standards are met, aquatic life would be protected also. A summary of the potential environmental impacts are presented in Tabk S-1 for the proposed action and in Tabk S-2 for the alternative action, and discussed below.

S.3.1 PROPOSED ACTION

The proposed action would result in an increase in the mass emission of BOD and TSS into the receiving water body, as compared to the existing conditions: however, the DO levels in the receiving water are expected to be maintained. Water quality monitoring would be included, and no treated effluent would be discharged when DO levels could fall below the established standards. Existing land disposal capacity is considered marginally adequate to dispose of effluent during periods when discharge would be prohibited: the City of Lodi has begun preparing an additional 275 acres of land to receive treated effluent to ensure adequate disposal capacity. As considered in the original EIR, the buildup of heavy metals in the soil would occur slowly as a result of the land disposal of effluent,

TABLE S-1

SUMMARY OF ENVIRONMENTAL EFFECTS. PROPJSED ACTION

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
The proposal action would result in an increased mass emission of pollutants, as compared to existing wnditions.	S	Additional water quality monitoring should be conducted to provide better data as to when ambient conditions are such that DO levels could fall below *5.0* mg/l. When such conditions arc present, WSWPCF effluent would be diverted for land application.	LS
The proposed action would increase the amount of treated effluent diverted to alternative disposal or storage facilities.	S	Because disposal capacity is considered *to* be marginally adequate to accommodate extended periods of irrigation when discharge is prohibited. the City of Lodi shall prepare an additional 275 acres of land for effluent application.	LS
The proposal action would result in the accumulation of heavy metals in the soils of croplands being irrigated with treated effluent.	S	As identified in the original EIR, the build-up of heavy metals in the disposal area soils would be mitigated by continuing and strengthening the City's existing industrial pretreatment requirements, with an emphasis on zinc removal.	LS

S = Significaat
LS = Less than Significant
B = Beneficial
SU = Significant Unavoidable

TABLE S-2

SUMMARY OF ENVIRONMENTAL EFFECTS - ALTERNATIVE ACTION

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
The alternative action would result in a decreased mass emission of pollutants, as compared to the existing conditions.	B	None required or recommended.	B
The alternative action would result in the accelerated accumulation of heavy metals in the soils of croplands being irrigated with treated effluent.	S	As identified in the original EIR, the build-up of heavy metals in the disposal area soils would be mitigated by continuing and strengthening the City's existing industrial pretreatment rquircment. with an emphasis on zinc removal.	LS
Implementation of the alternative action would result in an increased land area for effluent disposal.	S	The City of Lodi would be required to obtain approximately 1,600 acres of additional agricultural lands with which to dispose of the greater effluent volume.	LS

S = Significant
LS = Less than Significant
B = Beneficial
SU = Significant Unavoidable

but with a pretreatment program. effluent disposal could occur for about 200 years before the buildup reached levels whcrc additional land disposal would bc prohibited.

S.3.2 ALTERNATIVE ACTION

The alternative action would result in a reduction in the mas emission of BOD and TSS to the receiving water body. as compared to the existing conditions this would have a beneficial effect on water quality. However. the increasingly stringent effluent discharge limitations would require that substantially more effluent bc diverted to land disposal than presently occurs. The City of Lodi would therefore bc required to purchase additional lands to allow for the increased land disposal requirements. As considered in the original EIR. the buildup of heavy metals in the soil would occur slowly as a result of the land disposal of effluent, but with a pretreatment program, effluent disposal could occur for up to 500 years or more before the buildup reached levels whcrc additional land disposal would bc prohibited. This is because most of the metals a n contained in the sludge, which would bc essentially the same volume for each alternative, but would be spread over a greater land area for the alternative action.

S.4 UNAVOIDABLE SIGNIFICANT IMPACTS

S.4.1 PROPOSED ACTION

There would be no unavoidable significant impacts associated with the proposed action. The projected increase in the mas loading of pollutants is not expected to result in the violation of water quality standards. however, water quality monitoring would be included. and the treated effluent would bc diverted for storage and/or crop irrigation if receiving water quality were to be threatened. No additional lands would need to be obtained to provide adequate land disposal capability.

S.4.2 ALTERNATIVE ACTION

There would be no unavoidable significant impacts associated with the alternative action. However, additional lands would need to bc obtained by the City of Lodi to provide adequate land disposal capability to accommodate the increasingly stringent discharge limitations.

1. INTRODUCTION

1.1 PURPOSE OF THE SUPPLEMENTAL EIR

The purpose of this document is to revise and supplement the Environmental Impact Report (EIR) for the White Slough Water Pollution Control Facility (WSWPCF) Expansion (State Clearinghouse Number 87072105). This Supplemental Final EIR (SFEIR) has been prepared in accordance with the California Environmental Quality Act of 1970 (CEQA). The preparation of this Supplemental EIR is required under CEQA Guideline Section 15162 and 15163, because "new information of substantial importance to the project has become available" since the certification of the original EIR. The new information is in regards to the relationship between receiving water quality and the WSWPCF performance. Specifically, the Project Description of the original EIR assumed that the expanded facility would be capable of producing domestic effluent having 10 milligrams/liter (mg/l) or less biochemical oxygen demand (BOD) and total suspended solids (TSS) more than 90 percent of the time ("10/10 treatment")[1]. After several months of operation, the expected improvement in the quality of the effluent originally predicted for the expanded facility has not been fully realized, and therefore this Supplemental EIR is required to examine the environmental effects that could result from the expanded WSWPCF capacity with less than the originally anticipated treatment efficiency.

With regard to Final EIRs, CEQA states a Final EIR should consist of the Draft EIR (or a revision of the Draft): comments and recommendations received on the Draft EIR; a list of persons, organizations and public agencies commenting on the Draft EIR; the responses to significant environmental points raised in the review process; and any other information deemed necessary by the Lead Agency.

1.2 PROPOSED PROJECT UNDER REVIEW

The project considered in the original EIR involved the expansion of the WSWPCF from an average dry weather flow capacity of 6.2 million gallons per day (MGD) to 8.5 MGD (an increase of 2.3

MGD or a 37 percent increase in capacity), together with improvements to the wastewater irrigation and sludge handling systems. The proposed project under consideration in this Supplemental EIR is the same as that considered in the original EIR with one exception: the original EIR assumed that the expanded WSWPCF would routinely produce an effluent quality of 10 mg/l BOD and TSS. This Supplemental EIR assumes that the WSWPCF would produce an effluent with 30 mg/l BOD and TSS from 16 October to 31 May. and 20 mg/l from 1 June through 15 October.

The project evaluated in the original EIR assessed the increased capacity of the plant and increased efficiency and reliability of the treatment processes on different environmental factors. With most of the expansion of the plant completed there has been only a marginal improvement in effluent quality. The RWOCB is responsible for setting and enforcing WDRs for the WSWPCF. If WDRs were adopted based on the anticipated efficiencies assumed in the original EIR (i.e., "10/10 treatment'). the projected effluent characteristics would be different from those examined in the original EIR. For example, because the plant would not achieve this level of treatment as often as assumed in the original EIR. discharge of the effluent to the receiving waters would be reduced and increased storage capacities, land disposal and/or crop irrigation would be required. There are no substantive changa to the physical components of the project as described in the original EIR. The project operational characteristics an: the only changes that would result from the limitations imposed by effluent standards.

1.3 ENVIRONMENTAL REVIEW PROCESS

The environmental review process began with the issuance of a Notice of Preparation (NOP). The NOP was distributed in September, 1991 to a mailing list of local and state agencies, as well as concerned citizens. The purpose of an NOP is to notify individuals and public agencies that the environmental review process is commencing for a particular project, and to solicit input for the scope of analysis to be covered in the EIR.

A Supplemental Draft EIR (SDEIR) was published and circulated for review and comment by the public and other interested parties, agencies, and organizations for a 45-day review period, from April 24. 1992 to June 12. 1992. Now that public review has been completed, this Supplemental Final EIR (SFEIR) has been prepnrcd in response to written comments received during the public review period. A total of two comment letters were received on the SDEIR; these comment letters and the responses to them arc presented in Chapter 2 of this document. Certification of the SFEIR will then

hc considcrcd hv the City of Lodi's City Council. The City Council will bc responsible for certifying that rhc SFEIR has been completed in compliance with CEOA and that ihc environmental effects wcrc considcrcd prior to their decision to approve, revise or reject a specific project alternative.

1.4 CHANGES TO THE SDEIR RESULTING FROM THE PUBLIC COMMENTS

The focus of the SDEIR was to predict the impact of an increased BOD loading on the DO levels in the receiving waters of White Slough the impact analysis concluded that the impact would be less than significant because receiving water quality standards would be maintained. However, there remains uncertainties in the impact prediction due to the effects of other outside factors on DO levels. Therefore, an expansion of water quality monitoring activities was recommended to provide for improved predictive capabilities, and effluent would continue to be diverted for irrigation during periods when receiving waters contained low DO levels or when the effluent did not meet the required BOD levels. The impact analysis was reevaluated for this SFEIR to account for different summer and winter periods, but this reevaluation led to a lesser impact prediction: therefore, the impact prediction contained in the SDEIR was used because it provided for a more conservative impact assessment.

The only change in impact analysis that occurred as a result of the public comment on the SDEIR was with regard to the adequacy of the City's irrigation capacity. The adequacy of this capacity has been changed from being considcrcd adequate in being considered marginally adequate. The City of Lodi has therefore begun the process of upgrading an additional 275 acres of agricultural land to allow for expanded effluent irrigation demands. The City is presently studying the types of facilities that will be necessary lo allow for effluent irrigation on these lands. and funding for these facilities has bccn included in the City's capital improvement budget.

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1. Draft Environmental Impact Report, White Slough Water Pollution Control Facility Expansion. City of Lodi, April 1988; pg 3-12

2. COMMENTS AND RESPONSES

21 LIST OF COMMENTORS ON THE SDEIR

A total of two comment letters were received on the SDEIR one from the California Regional Water Quality Control Board Central Valley Region, and one from the State Water Resources Control Board. Division of Qcan Water Programs. Both of these comment letters, and responses to them, are presented below.

22 COMMENTS AND RESPONSES

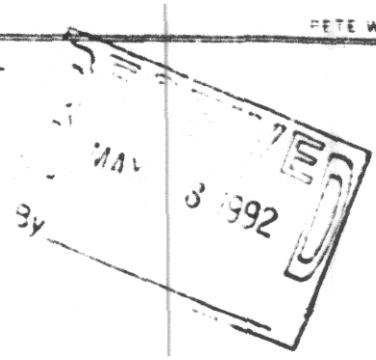
The comment letters received on the SDEIR are contained in this section. The comments are brackctcd, and arc followed by a summary of the comment and responses to these comments.

LETTER 1

STATE OF CALIFORNIA

PETE WILSON Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—
CENTRAL VALLEY REGION
3443 ROUTIER ROAD SUITE A
SACRAMENTO CA 95827 3098
PHONE (916) 361 5600
FAX (916) 361 5686



5 Hay 1992

Hr. David Friedland
EIP Associates
601 Montgomery Street, Suite 500
San Francisco. CA 94111

DRAFT SUPPLEMENTAL EIR, WHITE SLOUGH WATER POLLUTION CONTROL FACILITY, LODI, SAN JOAQUIN COUNTY

I reviewed the draft Supplemental EIR, dated 22 April 1992. by EIP Associates. The EIR is being prepared to address water quality impacts from discharging increased pollutant loads (800 and Suspended Solids) into Dredger Cut, Bishop Cut, and White Slough. 1 have the following comments:

1. The EIR uses data from the Technical Report (TR) entitled, 'Receiving Water Impacts of Treated Waste Discharges from White Slough Water Pollution Control Facility', dated January 1992. The TR defined the summer and winter seasons as follows: **1-1**

   Summer: 1 April to 31 October
   Winter: 1 November to 31 March

   The EIR defined summer to be 1 June to 15 October and winter to be 16 October to 31 May, decreasing the summer period when more stringent treatment standards would be in effect. However, the data from the TR were not representative of the time of year as defined in the EIR, and cannot be considered valid for the summer and winter time periods defined in the EIR.

   The Board will use the summer/winter schedule as defined in the TR in renewed Waste Discharge Requirements, as they were the basis for analysis of the environmental impacts of the discharge. The final EIR should correct its summer/winter definitions to that of the TR.

2. The supplemental EIR states that the land disposal capadlty is considered adequate to dispose of effluent durino periods when discharge would be prohibited. whereas the TR stated the capacity was marginally adequate. The Board is requiring the City to take the necessary steps to prepare the additional 250 acres for wastewater applications. Mitigation Measure 3.2.3-2 should be modified to take this into account. **1-2**

3. The TR was not conclusive that receiving water impacts will not occur from the increased BOO lording. The Board determined that the City must continue to study the impacts of the discharge on the receiving water **1-3**

during both discharge and non-discharge periods. The EIR should recognize this.

Please incorporate my comnents into the final supplemental EIR for the facility expansion.

Patricia Leary

PATRICIA LEARY
Associate Engineer

PHL;pl

cc: Mr. Fran Forkas, City of Lodi, Lodi

1-1 Commentor notes a difference between the dates used to define "summer" And "winter" periods in the SDEIR and the January 1992 Technical Report (TR), and states that the RWQCB will use the summer/winter schedule as dclincd in the TR for the renewed Waste Discharge Requirements.

The dates used in the SDEIR were:

Summer:	01 June to 15 October (4.5 months)
Winter:	16 October to 31 May (7.5 months)

The dates used for the water quality analysis in the January 1992 Technical Report were:

Summer	01 April to 31 October (7 months)
Winter:	01 November to 31 March (5 months)

The seven months used in the TR to define the 'summer' season were not chosen to define the time period when the revisal WDRs would be applied; rather. they were selected for two reasons. First, these dates completely bracket a time period that is "typical. for the dry and warm summer time of the year (as opposed to the wet and cold "winter" period). Therefore, any conclusions regarding water quality impacts based on the total period would be expected to apply to any given period within the total period. Second. using these data simplified the analysis of water quality and WSWPCF performance data. which have been entered into the computerized database by whole calendar months. For these reasons, several alternative time periods could have been selected for the analysis, including the dates used in the SDEIR.

In the RWQCB's comment on the SDEIR, it was stated that the RWQCB intended to change the "summer" and "winter time periods in the City's revised WDRs to the longer "summer. period used in the Technical Report. The WDRs are more stringent for the dry, summer season than for the wet, winter season. Based on this stated intention, the water quality data have been reevaluated to estimate the impact of treated effluent discharge on receiving water discharge wing the summer reason defined in the SDEIR. The results of this reevaluation are summarized in the following paragraphs.

The original and revised seasonal averages for various plant operating and water quality data are presented in Table 1 below. Note that there is very little difference between the original and revised "winter" periods; the values are essentially the same within normal statistical variations. However, the differences are greater for the revised 'summer" period. While the average flows are similar. the average effluent BOD concentration is approximately 18 percent higher for the revised period. This resultant higher BOD loading would have a correspondingly greater impact on the receiving water DO at both monitoring stations R-2 and R-3.

TABLE 1

ORIGINAL AND REVISED SEASONAL AVERAGES

Parameter	Summer Average: Technical Report (4/1 - 10/31)	Summer Average: Supplemental Draft EIR (6/1 - 10/15)	Winter Average: Technical Report (11/1 - 3/31)	Winter Average: Supplemental Draft EIR (10/16 - 5/31)	Annual Average
Flow, mgd	6 2	6.3	6.0	61	6 1
BOD, mg/L	28.2	33.4	26.3	24.6	27
BOD load, lb/d	1,514	1,814	1,317	1,249	1,423
DO at R-2	9.1	8.3	9.7	9.7	9.5
DO at R-3	9.4	a9	10.8	10.6	10.3

Source: Whitley, Burchett & Associates, Inc.

The magnitude of this impact at monitoring station R-2 can be seen when the revised averages are plotted on Figure 1. together with the original estimate of impact as presented in Figure 4 of the April 1992 SDEIR. In Figure 1, the original impact line represents the maximum measured difference in DO between White Slough and R-2 during the 24-hour diurnal test period on September 11, 1991. On that day, the avcragc DO difference over the 24-hour pcriod was 0.9 mgrl. and the maximum dillcrcncc was 2.0 mg/1. The BOD loading during the pcriod was 7M lb/day.

In plotting the revised impact line on Figure 1, the average BOD loading during the revised timc period is equal to 1.814 lb/day. This additional BOD loading lowered the DO at R-2 from an average of 9.1 mg/1 to 83 mg/1, or an additional 08 mg/1. Adding this to the 0.9 mg/1 average impact measured during the 24-hour diurnal test results in a revised average impact of 1.7 mg/1 at monitoring station R-2 The revised maximum impact. by direct proportion. would be (1.7 mg/1)/(0.9 mg/1) x (2.0 mg/1) = 3.8 mg/1. Note that using the shorter "summer" time pcriod actually results in a lower estimate of DO impact on the receiving waters than was presented in the SDEIR Thcrcforc, for the purpose of DO impact assessment for this Supplemental EIR. the original data will be used to provide a more conservative assessment of receiving water impact.

1-2 The commcntor notes that the SDEIR states that the land disposal capacity was considered adquatc to dispose of effluent when discharge was prohibited, whereas the TR stated that capacity was marginally adquatc. Commentor then notes that the RWQCB is requiring the City to prcparc the additional 250 acres of land for effluent disposal.

Comment noted; Mitigation Measure 3.2.3-2 has been modified to read "Because disposal capacity is considered to be marginally adquatc to accommodate extended periods of irrigation when discharge is prohibited. the City of Lodi shall prcparc an additional 275 acres of land for effluent application.' Please note that the actual acrcagc purchased by the City and being prepared tor irrigation is 275 acres rather than 250 acres.

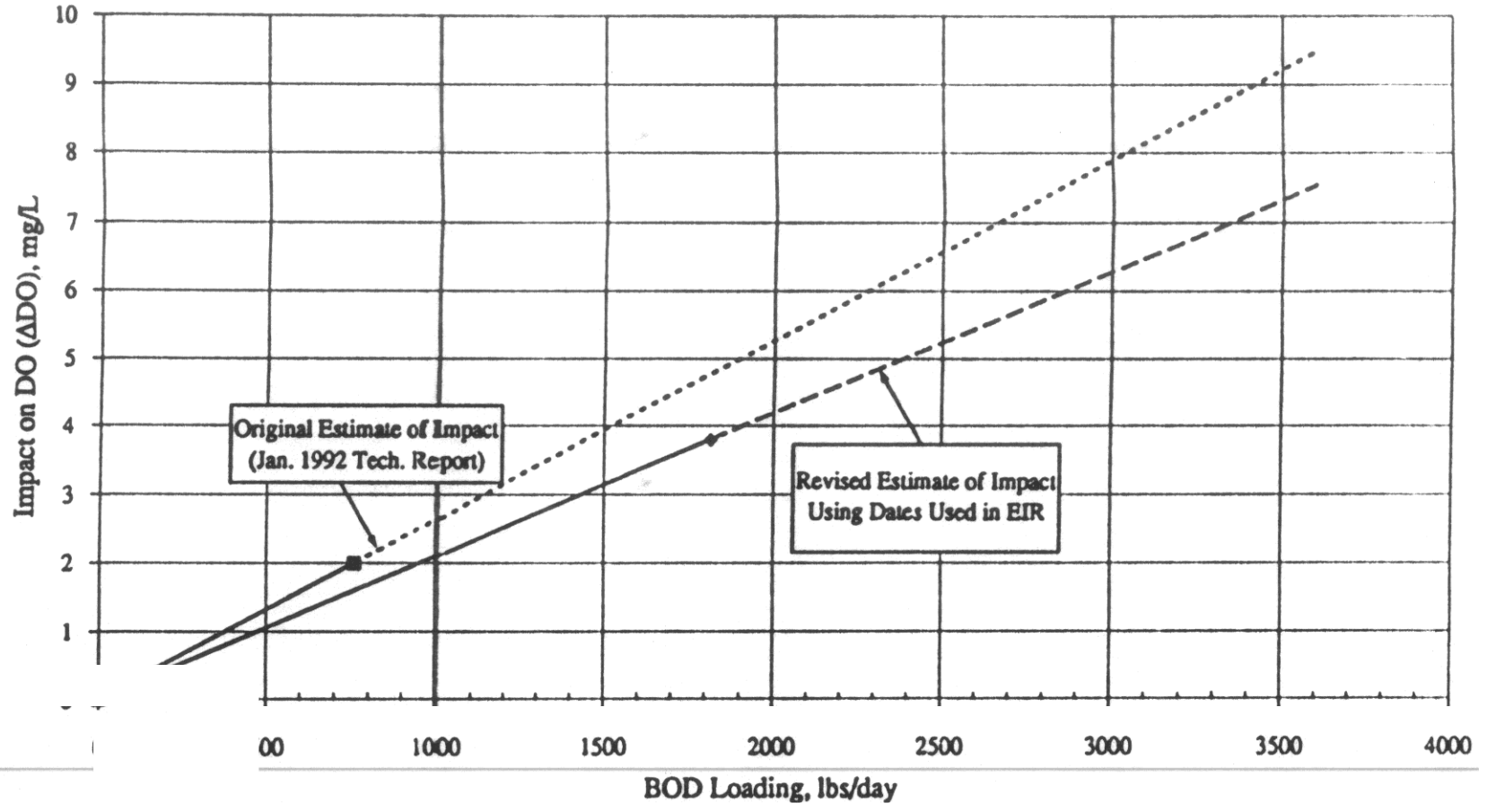
The City of Lodi is presently preparing the 275 acres of land to receive treated effluent when discharge is prohibited. The City is presently studying the specific facilities (such as pipelines and canal.) that will be necessary to supply treated effluent to these lands for imgation. and funding has been allocated in the City's capital improvement budget.

1-3 Commentor states that the TR was not conclusive in assuring that receiving water impacts would not occur, and states that the City must continue to study the impacts of effluent discharge on receiving watcr quality.

The EIR authors acknowledge that a degree of uncertainty exists regarding the prediction of receiving water DO levels as a function of effluent B O D this uncertainty and the method undertaken to reach a satisfactory prediction is described on pages 3-1 through 3-12 of the SDEIR Besides effluent BOD, a number of factors affect DO levels in the receiving watcr. including watcr flow rate and temperature, algae respiration and upstream BOD loadings. While the potential impact that would result from the expanded plant has been judged to lk less than significant because the best available data predict that the rccciving water DO standard of 5.0 mg/1 would be maintained, Mitigation Mcasurc 3.2.3-I states that additional water quality monitoring should be conducted because of the number of variables involved in actual DO levels, as described above and in Chapter 3 of the SDEIR.

PREDICTED MAXIMUM IMPACT OF BOD LOADING ON DO CONCENTRATIONS AT R-2

FIGURE 1

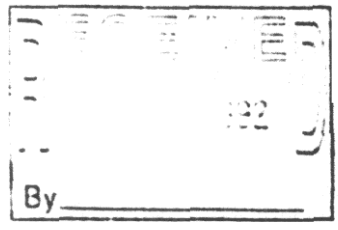


SOURCE: WESTLEY, BURCHETT & ASSOCIATES

LETTER 2

STATE OF CALIFORNIA
PETE WILSON, Governor

STATE WATER RESOURCES CONTROL BOARD
DIVISION OF CLEAN WATER PROGRAMS
2014 T STREET SUITE 130
P O BOX944212
SACRAMENTO CA 94244-2120
(916) 739-4417
(916) 739-2300 FAX



JUN 0 4 1992

Mr. David Friedland
EIP Associates
601 Montgomery Street, Suite 500
San Francisco, CA 94111

Dear Mr. Friendland:

SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT REPORT (SDEIR) -- CITY OF LODI (CITY), WHITE SLOUGH WATER POLLUTION CONTROL FACILITY EXPANSION (SCH# 92042098)

Thank you for the opportunity to review the above document. The State Water Resources Control Board. Division of Clean Water Programs (State Water Board), is responsible for administrating low interest loans for wastewater treatment plants under the State Revolving Fund Loan Program (SRF) and grants under the Small Community Grants Program (SCG). If the City will be seeking one of these loans or grants, the State Water Board will be a responsible agency under CEQA, and will use the final EIR when making a decision on whether to issue the loan. If this is the case, you should provide us with any draft environmental documents prepared for the project as soon as they become available. In addition, we would also appreciate notices of any meetings or hearings scheduled regarding the environmental aspects of the project. Specific comments follow. 2-1

1. If the project is to involve a SRF loan, which is partially funded by EPA, additional environmental documentation and review will be required. For SRF loans, we are required to consult directly with agencies responsible for implementing federal environmental laws. Please provide us with ten (10) copies of the original EIR prepared for the White Slough and circulated under State Clearinghouse No. 87072105 as well as ten (10) copies of the SDEIR so that we may initiate federal consultation. In addition, while CEQA itself does not require formal public hearings at any stage of the environmental review process, at least one hearing is required for a SRF loan project. Notices need to be distributed 30 days in advance. A copy of the notice and summary of the public review should be sent to the State Water Board with any loan application. 2-2

2. Under Impact 3.4.4-1, pages 3-15, it is stated that if this alternative were selected, an additional 1.600 acres of land would be required. Has the location of these lands been identified and if so, were potential environmental impacts associated with this alternative discussed in the original EIR? 2-3

3. Was a records search and an archaeological site survey conducted for the project? If this was not done. the City should request a records search for the project's impact area. The following address is provided to assist you in completing this requirement.

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Ms. Elizabeth Greathouse, Coordinator
Central California Information Center
California State University, Stanislaus
Turlock, CA 95380
(209) 667-3307
(209) 667-3333 FAX

If you require further assistance in this matter, please call me at (916) 739-4417.

Sincerely,

Joe L. Pope
Environmental Services Unit

cc: State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814

California Regional Water
Quality Control Board
Central Valley Region (5)
3443 Routier Road
Sacramento, CA 95827-3098

COMMENT LETTER 2 - CALIFORNIA STATE WATER RESOURCES CONTROL BOARD DIVISION OF CLEAN WATER PROGRAMS

2-1 Commentor notes that if the City of Lodi is contemplating a loan or grant from the State Water Board. the Water Board would be a responsible agency under CEQA

Comment noted: the City of Lodi is not seeking loam or grants from the State Water Board. and as such thcrc is no reason for the Stale Board to act as a responsible agency.

2-2 Commentor states that if a loan from the State Board is involved, additional environmental review would be required. including public hearings.

Comment noted; because no loan is being sought by the City of Mi. the additional environmental review requirements are not applicable to the project as presently proposed.

2-3 Commentor notes that the implementation of the alternative action would necessitate the use of an additional 1,600 acres of land for use for effluent disposal. and questions whether the impacts associated with this alternative were addressed in the original EIR.

While the location of the 1,600 acres of land that would be needed for this alternative have not been specifically identified, a much larger area of suitable agricultural lands exist in the region, and it would be considered feasible to site a project of this magnitude. Existing agricultural lands supporting field crops, alfalfa or pasture would be subject to cropping limitations. and cropping patterns could change. Other impacts identified are potentially reduced demand for fertilizers, and decreased ability to respond quickly to changing market demands. However. these were identified as economic impacts, and the City of M i could be required to financially compensate farmers for their losses.

2-4 Commentor questions whether an archival search and archeological field survey were conducted for the original EIR.

An archival cultural resources investigation was conducted for the original EIR and concluded that there was a potential for cultural resources to be located near the project site because the area was historically inhabited by Native American Indians. However, previous earthmoving activities have altered the ground surface in the area, and the impacts were therefore considered less than significant. No additional cultural resources investigations were conducted for the preparation of this Supplemental EIR because no additional ground disturbance was being proposed. only modified Waste Discharge Requirements.